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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

APR 18 2023

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Douglas - Jamal: Bright

Plaintiff(s),

vs.

DOMINIQUE M. GANDY; JUDITH
C. RICE; MAURA McMAHON ZELLER;
DOUGLAS W. SCOTFIELD;
AARON T. KORSON

Defendant(s).

1:23-cv-02420

Judge John J. Tharp, Jr

Magistrate Judge Heather K. McShain

RANDOM ASSIGNMENT

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Douglas - Jamal: Bright

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

4. Defendant, JUDITH C. RICE, is
(name, badge number if known)

☒ an officer or official employed by CIRCUIT COURT OF COOK COUNTY;
(department or agency of government)
_____ or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is CIRCUIT COURT OF COOK COUNTY. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about JANUARY 22, 2021, at approximately 3:00 ☐ a.m. ☒ p.m.
(month, day, year)
plaintiff was present in the municipality (or unincorporated area) of THE
CIRCUIT COURT OF COOK COUNTY, in the County of COOK,
State of Illinois, at 1500 MAYBROOK DRIVE, MAYWOOD, ILLINOIS,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (***Place X in each box that applies***):

- ☒ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☒ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

4. Defendant, MAURA McMATTON ZELLER, is
(name, badge number if known)

☒ an officer or official employed by CIRCUIT COURT OF COOK COUNTY;
(department or agency of government)
_____ or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

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- ☒ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

4. Defendant, AARON T. KORSON, is
(name, badge number if known)

☐ an officer or official employed by _____;
(department or agency of government)

☒ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is CIRCUIT COURT OF COOK COUNTY. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

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CIRCUIT COURT OF COOK COUNTY, in the County of COOK,
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- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

4. Defendant, DOUGLAS W. SCOFIELD, is
(name, badge number if known)

☐ an officer or official employed by _____;
(department or agency of government)

☒ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is CIRCUIT COURT OF COOK COUNTY. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about January, 22, 2021, at approximately 3:00 ☐ a.m. ☒ p.m.
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plaintiff was present in the municipality (or unincorporated area) of THE
CIRCUIT COURT OF COOK COUNTY, in the County of COOK,
State of Illinois, at 1500 MAYBROOK DRIVE, MAYWOOD, ILLINOIS,
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when defendant violated plaintiff's civil rights as follows (***Place X in each box that applies***):

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- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

4. Defendant, DOMINIQUE M. GANDY, is
(name, badge number if known)

☐ an officer or official employed by _____;
(department or agency of government)
_____ or

☒ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is CIRCUIT COURT OF COOK COUNTY. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

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- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☒ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: **(Leave blank if no custom or policy is alleged):** Illinois Marriage and Dissolution of Marriage Act.
8. Plaintiff was charged with one or more crimes, specifically: Contempt of Court, Trespassing, Order of Protection
9. **(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")** The criminal proceedings
- ☐ are still pending.
- ☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹
- ☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows _____
- ☒ Other: Violation of parental and Constitutional rights in State Court proceedings.

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

Since January 2021, the Constitutionally protected rights of Plaintiff, Douglas-Jamal Bright have been violated under color of law in Domestic Relations case # 2021D430050 in the CIRCUIT COURT OF COOK COUNTY. See the attached.

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

Mental anguish due to unjustified writs. Financially damaged due to the extortions of the lower courts. Livelihood has been negatively affected due to eradication of employment. False imprisonment.

13. Plaintiff asks that the case be tried by a jury. ☐ Yes ☒ No

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including

attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: By: Douglas Jamal Bright

Without Recourse

Plaintiff's name (print clearly or type): Douglas - Jamal Bright

Plaintiff's mailing address: 40 14629 Parkside Drive

City Dolton State Illinois ZIP [60419]

Plaintiff's telephone number: (312) 852-3802

Plaintiff's email address (if you prefer to be contacted by email): _____

douglasjbright@gmail.com

15. Plaintiff has previously filed a case in this district. ☐ Yes ☒ No


If yes, please list the cases below.

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.

Violations Against Plaintiff

1. Attorney Douglas W. Scofield, EIN # 903900490, has excessively and consistently disregarded Constitutional Rights, Law of the Land, and Time.
2. Defendant's attorney, Mr. Scofield has repeatedly called Douglas- Jamal: Bright out, in open court such as "conspiracy theorist" and suggesting mental evaluations which are grounds for Defamation of Character.
3. Operating under the Color of Law, include all but not limited to: jurisdiction, imposing writs, constant overrides of obvious truths, scandalous, lethal, illegal and unlawful attempts to retrieve fiat.
4. Forced entanglement of Title 42.
5. Forced contracts under threat, duress, and coercion.
6. Denial of Due Process. Bill of Rights.
7. Denial of Freedom of Speech. Plaintiff was viciously silenced by the Magistrate, McMahon while granting writs to Scofield. Bill of Rights.
8. False imprisonment of which is punishable by law and includes tort law.
9. Improper use of a minor's full name, which appears twice throughout the case instead of last four of social security number or minor's initials.
10. Pursuit of happiness. Bonding time. Parental Rights and Responsibilities Act of 1995.
11. Denial of heir's upbringing. Disengaging the plaintiff's right to establish a father/son possible endeavors. Illinois General Assembly.
12. Decisions concerning healthcare. Including but not limited to: Covid 19 vaccinations, jabs, immunizations, and mental diagnosis. Illinois General Assembly.
13. Allowing a previous attorney, Aaron Kroson, EIN # 1000862014, Zoom I.D. 985 4839 3692 pw 765383, of whom previously withdrew from the case, to intercept and invade during a proceeding to discuss a bill of monies due for services that were never rendered.
14. Order of Protection, unwarranted and served as well as a prior body attachment without any prior perceived violence.
15. Magistrate Maura McMahon- Zeller, has enforced several writs during the duration of this case. McMahon- Zeller has also coached Scofield, reiterating previous occurrences such as the body attachment.
16. Visitations were unlawful, supervised, set and arranged by Dominique Gandy. Gandy would deliberately impede upon each visit. As the defendant allowed one hour, per visit. A total of five visits over the course of a six month span.
17. Denied Remedies. Defendant, along with her attorney, and former judges, have successfully violated all laws, sanctions, and codes. Every motion has been stricken and denied. He who brings the problem, must provide the remedy.
18. Initial Magistrate, Judith C. Rice, violated, overlooked, and wholeheartedly dispelled many attempts to represent and address an array of fictitious allegations. With a copy of her oath in hand, the oath was recited to remind her of the position she upheld in the Circuit Court of COOK COUNTY.

19. Both judges have failed to exhibit their ability to exercise their position as Trustee in the interest of the plaintiff.

By: 
Douglas-Jamal: Bright
Without Recourse

Notary as JURAT CERTIFICATE

Illinois [State]

Cook [County]

On this 18 day of April, 2023 before me, Tiffany F. Slaton, a Notary

Public, personally appeared

Douglas Jamal Bright, who proved to me based on-satisfactory evidence to be the Executor named within instrument and verified to me that he executed the instrument and that by his autograph(s) affixed on the instrument the man executed the instrument and all claims and rights asserted by him stands as truth, uncontested without rebuttal and all rights preserved forevermore.

I verify under PENALTY OF PERJURY under the lawful laws of Illinois, state that the foregoing paragraph is true and correct. WITNESS my hand and official seal.

Tiffany F. Slaton

Signature of Notary/Jurat Seal

